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**PASHMAN STEIN**

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Counsel for Plaintiff,  
**N.V.E., Inc.,** and  
Third-Party Defendants,  
**Robert Occhifinto and Walter Orcutt**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

N.V.E., INC.,

Plaintiff,

v.

JESUS J. PALMERONI a/k/a JOSEPH  
PALMERONI, RONALD SUMICEK,  
SUNBELT MARKETING, ABC  
CORPORATIONS 1-10, and JOHN DOES  
1-10,

Defendants.

JESUS J. PALMERONI,

Third-Party Plaintiff,

v.

ROBERT OCCHIFINTO AND WALTER  
ORCUTT,

Third-Party Defendants.

CIVIL ACTION NO. 06-5455  
(GEB) (ES)

MOTION DATE: November 1, 2010

**NOTICE OF CROSS-MOTION TO  
EXTEND THE TIME PERIOD SUBJECT  
TO DISCOVERY AND OPPOSITION TO  
PALMERONI MOTION TO QUASH  
DOCUMENTS AND FOR A PROTECTIVE  
ORDER RELATING TO GLOBAL  
MARKETING AND SALES GROUP, LLC**

**TO: LAW OFFICE OF FRED SHAHROOZ SCAMPATO, ESQ.**  
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**SIRS:**

**PLEASE TAKE NOTICE** that as soon as counsel may be heard, the undersigned, counsel for N.V.E. Inc. ("NVE"), Robert Occhifinto and Walter Orcutt shall apply to the United States District Court, District of New Jersey, Martin Luther King, Jr. Federal Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey way of Cross-Motion seeking to extend the time period subject to discovery beyond the current June 30, 2006 cut off; and

**PLEASE TAKE FURTHER NOTICE** that NVE relies upon the attached Memorandum of Law and Certification of Samuel J. Samaro, Esq. in support of this cross-motion and in opposition to the motion to quash filed by defendant/third party plaintiff, Jesus Palmeroni, and all pleadings and papers on file in the above-captioned matter; and

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is attached.

**PLEASE TAKE FURTHER NOTICE** that plaintiff hereby requests oral argument.

**PASHMAN STEIN**  
A Professional Corporation  
Attorneys for Plaintiff,  
**N.V.E., Inc.** and  
Third-Party Defendants,  
**Robert Occhifinto and**  
**Walter Orcutt**

Dated: October 12, 2010

By: s/ Ellen W. Smith  
**ELLEN W. SMITH**  
**SAMUEL J. SAMARO**  
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